



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number : 09/366,135 Confirmation No.: 2699
Applicant : Lloyd ADAMS *et al.*
Filed : August 2, 1999
Title : NETWORK BASED FINANCIAL TRANSACTION PROCESSING
SYSTEM
TC/Art Unit : 3628
Examiner: : S. E. Chencinski
Docket No. : 72167.000105 (FORMERLY J2167/0105)
Customer No. : 21967

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Sir:

This is Appellant's Reply Brief responsive to the Examiner's Answer mailed October 27, 2005, in connection with the above-captioned patent application. Appellant presents this brief to clarify points raised by the Examiner in the Examiner's Answer.

I. Campbell Integrates Accounting Systems; The Present Invention Retains Separate Accounting Systems

The Examiner writes that "Campbell teaches an integrated transaction accounting system. ... Appellant's invention is also an integrated financial transaction accounting system because it is integrated at the data terminal..." Examiner's Answer, page 9. This statement illustrates a fundamental misunderstanding as to what is claimed in the present invention. The independent claims each recite some variation of "a plurality" of "financial transaction accounting systems"

or “account processors.” These limitations reflect that the present invention retains the structure of separate accounting systems when, for example, several financial institutions merge.

By contrast, Campbell is solely directed to integrating a plurality of accounting systems into a single homogenous system. Campbell explicitly recites that “it is an object of the present invention to provide a centralized financial data processing system which ... integrates various individual loan and financial processing and accounting systems...” Campbell, Column 1, lines 61-63. Campbell further clarifies that a single database keeps all data necessary for any transaction. *See* Campbell, column 1, line 66 - column 2, line 2 and column 3, lines 40-64. Such a single database is irreconcilable with retaining separate accounting systems.

Reliance on Campbell’s mini-computers as a disclosure of multiple accounting systems is a red herring. Specifically, such mini-computers contain mirror copies of the data stored in Campbell’s exhaustive central database. *See* Campbell, Column 3, lines 40-64; *see also* Examiner’s Answer at 11 (“the host central computer backs up the distributed computers and the distributed computers back up the host computer...”). Thus, Campbell discloses identical, redundant databases, which are each capable of independently completing any given transaction. Again, this feature is inconsistent with retaining separate accounting systems. Campbell simply fails to disclose or suggest, and in fact teaches away from, retaining a plurality of accounting systems as claimed.

II. The Use of Official Notice

The Examiner’s Answer incorrectly suggests that Appellants did not seasonably traverse the use of official notice. To the contrary, the very next response to the Office Action in which it

appeared traversed the Examiner's official notice. *See* Response mailed April 9, 2003, page 7. Appellants therefore disagree with any suggestion that Appellants agree with or admit the official notice as prior art. *Cf.* Examiner's Answer, pages 13-14.

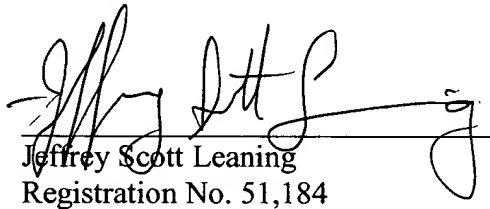
III. Conclusion

For at least the foregoing reasons, the rejections of claims 69-157 should be reversed.

Respectfully submitted,

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